

# EXHIBIT 2

1           A. The answer's no. But just to keep it  
2 clear, if the firm did it, it would have been  
3 done by Cory. So he's the only one --

4           Q. Right. But he --

5           A. -- who can answer that question. Since  
6 to my knowledge --

7           Q. Right. But he's not here --

8           A. -- neither I --

9           Q. -- he's not designated as a 30(b)(6)  
10 person to testify.

11          A. That's correct.

12          Q. Okay. I don't think we are  
13 misunderstanding each other. I understand you've  
14 got the firm -- the file and that -- and I'm just  
15 trying to confirm that's the entire amount of  
16 information the person who is here representing  
17 the law firm has as far as answering these  
18 questions.

19          A. That is correct. Know absolutely  
20 nothing about it --

21          Q. Okay.

22          A. -- other than what's in the file.

23          Q. All right. Understanding Exhibit 2 is  
24 the communications -- I represented that are the  
25 only communications that I see in the file

1 firm, I believe that's the same number as your  
2 firm.

3 (Dft. Exhibit No. 4 marked for  
4 identification.)

5 A. Yes, it is.

6 Q. Do you see that? So that's not Chad's.

7 And then just to kind of familiarize you  
8 with this email. After that, that's when Cory  
9 responds and says, no, we need to add Moss,  
10 Kuhn & Fleming, you see that.

11 Do you have any -- I mean, would you  
12 agree that Cory acting on behalf of your firm  
13 affirmatively had Moss, Kuhn & Fleming added to  
14 that check?

15 A. Yes.

16 Q. And do you have any information that  
17 Chad Westendorf was involved in that decision in  
18 any way?

19 A. I don't know one way or the other, so  
20 no.

21 Q. Okay.

22 MR. PENDARVIS: I just got kicked  
23 out of Zoom. I don't know whether the rest did.

24 I'm back in.

25 Q. There was reference to Forge Consulting